



11 SUNRISE PLAZA, STE. 305
VALLEY STREAM, NY 11580
(516) 233-1660
WWW.LIEBOWITZLAWFIRM.COM

December 3, 2020

VIA ECF

Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Proimos v. Madison Property Group, LLC, 1:20-cv-04832 (LJL)*

Dear Judge Liman:

We represent Plaintiff Alex Proimos in the above-captioned case and write to respectfully request that the Court adjourn the conference *sine die* in light of Plaintiff's filing of a motion for default judgment [Dkt. #13]

- 1) The original conference is scheduled for December 7, 2019 at 11:00 a.m.;
- 2) This is the first request for an extension;
- 3) No previous requests have been granted or denied;
- 4) The opposing party has defaulted;
- 5) There is no other conference currently scheduled and no other dates will be affected.

Respectfully Submitted,

s/jameshfreeman/
James H. Freeman

Counsel for Plaintiff